

# STONE MAGNANINI

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## COMPLEX LITIGATION

May 31, 2024

**VIA CM/ECF and EMAIL**

Hon. Michael A. Hammer  
Martin Luther King Building  
and U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

Re: United States v. Jobadiah Weeks (19-cr-877-CCC)  
Request to Modify Conditions of Release

Your Honor:

Please accept this letter in lieu of a more formal motion on behalf of defendant Jobadiah Sinclair Weeks. I have been advised that neither the government nor Pretrial Services objects to this application.

We respectfully move to modify the Order Modifying Conditions of Release for Mr. Weeks [DKT. 331 (subsequently modified by DKT. 335)] to add two additional third party custodians (subject to the approval of Pretrial Services) – John Packer and Megan Chelsey Gahm – who agree (a) to supervise Mr. Weeks in accordance with all the conditions of release; (b) to use every effort to assure Mr. Weeks’ appearance at all scheduled court proceedings; and, (c) to notify the court immediately in the event that Mr. Weeks violates any conditions of release or disappears. Mr. Packer and Ms. Gahm understand that Mr. Weeks is required to remain in the presence of one of the third-party custodians at all times, unless otherwise approved by Pretrial Services.

On March 26, 2024, this Court modified Mr. Weeks’ release conditions to include one additional third party custodian to be responsible for the duties set forth above (*i.e.*, Sophia Kelly Treantafeles) in addition to Mr. Weeks’ parents – Silence Weeks and Nathaniel Weeks. [DKT. 331]. However, on April 10, 2024, this Court further modified Mr. Weeks’ release conditions by granting Mr. Weeks’ request to remove Ms. Treantafeles as a third-party custodian for good cause shown. [DKT. 335].

Mr. Weeks now seeks modify his conditions of release to include two additional third-party custodians to be responsible for the duties set forth above. This modification of conditions will allow Mr. Weeks’ two parents (and current third-party custodians) to attend to personal

matters that may involve out of state travel from time to time.<sup>1</sup> The posture of this case makes it especially appropriate to allow Mr. Weeks' parents some limited personal travel because they have been serving as Mr. Weeks' third-party custodians for a number of years already and because the government has represented that Mr. Weeks' sentencing is likely to occur no later than September 2024.

Accordingly, Mr. Weeks seeks to modify paragraph (2) of the Additional Conditions of Release [DKT. 331] to read as follows:

Silence Weeks and/or Nathaniel Weeks and/or John Packer and/or Megan Chelsey Gahm agree (a) to supervise the defendant in accordance with all the conditions of release; (b) to use every effort to assure the appearance of the defendant at all scheduled court proceedings; and, (c) to notify the court immediately in the event that the defendant violates any conditions of release or disappears. The defendant shall remain in the presence of one of the third-party custodians at all times, unless otherwise approved by Pretrial Services.

For the foregoing reasons, Mr. Weeks' request to modify the conditions of his release to include two additional third-party custodians should be granted.

Respectfully submitted,

/s/ David Stone

David S. Stone

cc: AUSA Anthony Torntore *(via CM/ECF and email)*  
David Hernandez *(via email only)*

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<sup>1</sup> On March 26, this Court ordered that Ms. Treantafeles was to be added as a third-party custodian, in part, for the same reason.